

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROBERT JOHN SIMMONS, Individually	§	
And as Representative of the ESTATE OF	§	
GEORGIA ANN SIMMONS, JEFFREY	§	
ROBERT SIMMONS, and SHERRI RENE	§	CIVIL ACTION NO. 3:14-cv-00488
BOWMAN,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
JOE M. FINCE, PsyD; KRANTI	§	
PURIMETLA, MD; AILEE FISHER, MD;	§	
RHONA MIRANDA, RN; THE TEXAS	§	
DEPARTMENT OF STATE HEALTH	§	
SERVICES,	§	
<i>Defendants.</i>	§	

DEFENDANT’S UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE

TO THE HONORABLE JANE BOYLE:

Defendant The Texas Department of State and Health Services (“DSHS”) moves that the deadline to answer or otherwise respond to Plaintiffs’ Original Complaint filed on February 10, 2014 be extended for all Defendants to March 25, 2014. Good cause exists because this case involves multiple parties.

The undersigned counsel has conferred with Plaintiffs’ counsel, who is unopposed to this motion.

DATE: February 28, 2014

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DAVID C. MATTAX
Deputy Attorney General for Defense
Litigation

JAMES "BEAU" ECCLES
Division Chief - General Litigation

/s/ Drew L. Harris

DREW L. HARRIS

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiffs, Peter Hofer by phone and email on February 27 and 28, 2014, and he indicated Plaintiffs are unopposed to this motion.

/s/ Drew L. Harris

DREW L. HARRIS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent via Electronic Filing Notification System on this the 28th day of February, 2014, to:

Peter Hofer
Liane Janovsky
DISABILITY RIGHTS TEXAS
Attorneys for Plaintiff

/s/ Drew L. Harris

DREW L. HARRIS